

JAP:TJS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

11-1265M

- - - - -X

UNITED STATES OF AMERICA

S U P P L E M E N T A L  
C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

DANIELLE WYNN,

Defendant.


- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

THOMAS WILBERT, being duly sworn, deposes and states that he is a Special Agent with United States Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On December 22, 2011, the defendant DANIELLE WYNN voluntarily removed a vaginal insert with a total gross weight of approximately 177.7 grams of cocaine. Commencing on or about December 22, 2011, WYNN passed a total of 2 pellets that did not test positive for the presence of a controlled substance.

WHEREFORE, your deponent respectfully requests that the defendant DANIELLE WYNN be dealt with according to law.

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THOMAS WILBERT  
Special Agent  
U.S. Department of Homeland  
Security  
Homeland Security Investigations

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